CONNECTED NATION®

COMMENTS ON E-RATE REFORM

OCTOBER 30, 2013

AGENDA

- **A generational opportunity to get E-rate right**
- **Scope of the challenge – school and library connectivity collected by CN**
- **Connected Nation's proposals to the FCC**
  - E-rate should prioritize high-speed broadband
  - E-rate rules should incentivize community technology planning efforts
  - The FCC should initiate a comprehensive review to release E-rate data already collected and develop better E-rate data tools

- **Connected Nation's E-rate Comments -** http://apps.fcc.gov/ecfs/document/view?id=7520944011

A GENERATIONAL OPPORTUNITY TO GET E-RATE RIGHT

- **What We Know**
  - K-12 education is undergoing a foundational transformation driven by information technology
  - Educators, technologists, educational content developers, device manufacturers and broadband providers are testing models of how technology can enhance – or detract - from the learning experience
  - Education and Digital Skills are an ongoing and lifelong need
  - Applications and services are increasingly IP-based and will increasingly depend on broadband in the school, in the classroom, and off campus
- **What We Don't Know**
  - Best practices on which technology will best support educators is yet to be determined, because innovation is ongoing and messy
  - Full extent and need for legacy services now and in future

A GENERATIONAL OPPORTUNITY TO GET E-RATE RIGHT

- **The FCC should take a 'long view' and determine how E-rate can best support this transformational process**
  - Prioritization of broadband is needed, but E-rate rules should be flexible enough to accommodate different technology needs of educators and librarians
  - Short-term budgetary considerations should not cripple E-rate's ability to effectively support this transformative process
  - E-rate should **encourage** and **incentivize** cost-saving and welfare-enhancing actions by applicants

SCOPE OF CHALLENGE

ESTIMATED PERCENTAGE OF INSTITUTIONS WITH DOWNLOAD SPEEDS OF 100 MBPS OR GREATER		
	Schools	Libraries
Alaska	11%	<1%
Iowa	7%	2%
Michigan	38%	3%
Minnesota	1%	<1%
Nevada	54%	<1%
Ohio	66%	1%
Puerto Rico	<1%	<1%
South Carolina	47%	7%
Tennessee	37%	1%
Texas	23%	10%
All 10 Jurisdictions	34%	3%

Source: Examining School and Library Broadband Connectivity: A Connected Nation Policy Brief
http://www.connectednation.org/sites/default/files/bb_pp/connected_assessment_policy_brief_final.pdf

ESTIMATED PERCENTAGE OF INSTITUTIONS WITH DOWNLOAD SPEEDS OF 100 MBPS OR GREATER				
	Schools		Libraries	
	Rural	Non-Rural	Rural	Non-Rural
Alaska	5%	45%	<1%	<1%
Iowa	4%	13%	1%	2%
Michigan	37%	42%	3%	4%
Minnesota	1%	<1%	<1%	<1%
Nevada	12%	70%	<1%	<1%
Ohio	62%	71%	<1%	3%
Puerto Rico	<1%	<1%	<1%	<1%
South Carolina	46%	50%	5%	10%
Tennessee	29%	45%	<1%	1%
Texas	8%	61%	6%	12%
All 10 Jurisdictions	23%	53%	2%	4%

ESTIMATED PERCENTAGE OF INSTITUTIONS WITH DOWNLOAD SPEEDS OF 100 MBPS OR GREATER BY COUNTY-LEVEL MEDIAN HOUSEHOLD INCOMES				
County-Level Median Household Income	Schools		Libraries	
	Rural	Non-Rural	Rural	Non-Rural
Less than $15,000	<1%	<1%	<1%	<1%
$15,000 - $24,999	3%	<1%	<1%	<1%
$25,000 - $34,999	26%	16%	1%	<1%
$35,000 - $49,999	26%	62%	2%	4%
$50,000 or more	28%	57%	2%	5%
Average	23%	53%	2%	4%

1. HIGH-SPEED BROADBAND PRIORITIES

E-rate should prioritize funding of applications in following order –

- High-Speed Broadband **to the** school and library **premise**
- **Broadband throughout** the school and library premise
- **Mobile broadband connectivity to student devices** to ensure **all students** can access educational content whenever and wherever they need it

OFF-CAMPUS CONNECTIVITY

- **We cannot let the Broadband Adoption Gap become an Education Achievement Gap**
- **24/7 connectivity of student devices is an essential component of successful models of Ed Tech learning**
- **Educators experimenting with 1:1 e-learning models are faced with disparate realities:**
  - Schools serving wealthy communities can safely assume that the student population has broadband at home
  - But that assumption does not hold true for schools that serve low-income and rural communities -- educators need to address lack of at-home connectivity across significant (30%, 50% or more) portions of their student population
  - Where schools and educators cannot find solutions for this connectivity, they will curtail reliance on new technology and in the process create an education technology gap
- **E-rate can bridge this gap by including off-campus student device connectivity as an eligible service in communities that face substantial broadband adoption gaps**
- **Prepaid wireless connectivity for the student body can be significantly less-expensive than retail monthly per-MB data plan pricing – and also can be subject to competitive bidding**

2. INCENT COMMUNITY TECHNOLOGY PLANNING

- **E-rate should incent and prioritize applications in which the applicant demonstrates that its broadband upgrade is part of a larger community plan that includes –**
  - Coordinated demand
  - Cost-cutting infrastructure actions, and
  - Community-wide adoption and digital literacy training initiatives
- **Vibrant and comprehensive community technology planning will help ensure that E-rate funds are spend efficiently and effectively**
- **Proper planning will avoid duplication of costly effort (“Digging Twice”)**

3. FCC SHOULD LEAD A COMPREHENSIVE REVIEW OF E-RATE DATA COLLECTION AND RELEASE

- **The FCC and USAC should regularly release data on –**
  - Funding levels by type of services
    - Based on a revised taxonomy of type of services that is meaningful to library and education technology experts, and relevant to local, state, and federal policy makers and stakeholders
  - Information on service levels supported by E-rate
    - Metrics such as broadband capacity per student and or device and other quality of service measures
  - Libraries and schools' technology choices and prices supported via E-rate
- **Information should be available by beneficiary – not just by applicant**
- **Data should be accessible via multiple formats useful to policy researchers, E-rate stakeholders and the general public**
  - Including downloadable databases and GIS data visualization databases that offer easy-to-use access to information on E-rate subsidies by beneficiary (not just applicants)

THE FCC SHOULD LEAD A COMPREHENSIVE REVIEW AND REFORM OF E-RATE DATA

- **"Better Data" does not mean "Greater Burden" for applicants**
  - USAC has much of this data today, but it not be in a format that enables easy data analysis
  - The review should examine existing processes, search for solutions to better mine existing data, and consider ways in which data inputs from applicants should be reformed by adding as well as eliminating data inputs from applicants
- **"Better Data" can mean "Cost Savings" – especially if applicants can more readily understand costs and services being bought by their peers**
- **To achieve this comprehensive review of data collected and released by USAC, the FCC should work closely with USAC and leverage the technical expertise of private stakeholders**

Thank you

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